

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Thursday, January 20, 2022 4:30 PM
To: Covaleski, Paul <PCovaleski@gklaw.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

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Paul,

I reached out to the City about search capabilities.

The system can do wildcard search extenders (i.e., time* will produce times, timely, timeliness, etc.)

The system has connectors such as AND and OR and also has a MINUS feature that operates similar to a but not.

The system has the ability to search by specific date ranges (7/1/20-3/15/21).

The system does not allow for Boolean searching so it cannot do, for example, Edgewood w/25 of lights.

The system also does not have the capability to build complex searches where internal parenthesis are done first. So for example it could not do something like ((Edgewood and lights) or (Edgewood and stadium)) and Tucker. You would have to run separate searches.

Thanks.

Sarah

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From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Wednesday, January 12, 2022 3:53 PM
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Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Sarah,

Thank you and Tanner for taking time to comprehensively discuss Defendants' responses and objections to Edgewood's Interrogatories and Requests for Production earlier this morning. Although we were unable to agree on certain responses, I'm glad we were able to agree on others. For numerous other responses, we agreed that further discussion/follow-up/actions were necessary before we conclude that we are in agreement or at an impasse. I wanted, therefore, to briefly outline what we understand to be each side's "homework" coming out of today's meet and confer.

Defendants

- We agreed that you would reach out to certain custodians to obtain more information on certain discovery requests/responses, as identified and discussed during our meet and confer. Our understanding is that you will reach out and provide an update after you receive additional information.
- For Request Number 36, you indicated you may not be withholding documents on the basis of your objections and accordingly may supplement your answer. Our understanding is that you will update us when this decision has been made.
- The parties agreed that running targeted search terms may help resolve some or many of the parties' issues. Edgewood is happy to put together a preliminary list of suggested search terms; however, you have agreed to first reach out to the City's IT Department to get a better understanding of their systems' search terms capabilities and functionality.

Edgewood

- We agreed to draft a comprehensive letter memorializing the parties' agreements, impasses, and areas for further discussion at today's meet and confer. We will of course endeavor to memorialize our conversation as accurately as possible, but we ask that you carefully review the letter and identify any concerns you have so the parties can work from this document moving forward.
- We will confer internally regarding several of your compromise proposals, as outlined in your January 11 correspondence and discussed at today's meet and confer. We will include our responses in the above-mentioned letter.
- We will confer internally regarding your proposed list of custodians, and let you know if we have any concerns or proposed edits/additions/subtractions.
- We will draft a correspondence providing a more detailed description of our positions on Defendants' responses and objections to Edgewood's Requests for Admission, which we were not able to get to today (through neither party's fault). Our hope is that this may lead to a quicker meet and confer regarding the RFAs.
- We will draft proposed targeted search terms after we receive information regarding the City systems' search capabilities and functionality. To that end, is it possible to get this information by early next week? It will take Edgewood a few days to draft a proposed list of search terms after receiving this information, which will then have to be agreed on and tested, so we would in particular like to keep this moving.

Please let us know if we are forgetting anything, or if this is inconsistent with your understanding of the parties' agreed upon tasks moving forward.

Thanks,

Paul Covaleski | Attorney
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